

# **ATTACHMENT 4**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CISCO SYSTEMS, INC., )  
)  
Plaintiff, )  
) Case No.  
vs. ) 5:14-cv-05344-BLF (PSG)  
)  
ARISTA NETWORKS, INC. )  
)  
Defendant. )  
)  
\_\_\_\_\_ )

\*\*\* HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*\*

VIDEOTAPED DEPOSITION OF BALAJI VENKATRAMAN  
Palo Alto, California  
Tuesday, May 2, 2016  
Volume I

Reported by:  
CARLA SOARES  
CSR No. 5908  
Job No. 2302931  
Pages 1 - 116

Page 1

1 MR. SANTACANA: Eduardo Santacana of Keker  
2 & Van Nest. I represent the defendant, Arista  
3 Networks.

4 MR. WONG: Ryan Wong from Keker & Van Nest  
5 for Arista Networks.

6 MR. HOLMES: Drew Holmes with Quinn  
7 Emanuel of behalf of Cisco.

8 MR. GARTEN: Tom Garten of Covington &  
9 Burling for the witness and HP Enterprise.

10 MS. JOHNSON: Angela Johnson for HP  
11 Enterprise.

12 THE VIDEO OPERATOR: Thank you.

13 Will the certified court reporter please  
14 swear in the witness.

15 BALAJI VENKATRAMAN  
16 having been administered an oath, was examined and  
17 testified as follows:

18 EXAMINATION

19 BY MR. SANTACANA:

20 Q Good morning, sir. Could you please state  
21 your full name for the record?

22 A Balaji Venkatraman.

23 Q Could you spell that?

24 A B-A-L-A-J-I, V-E-N-K-A-T-R-A-M-A-N.

25 Q Who is your current employer?

1 Q How does it query the devices that it  
2 finds in the network?

3 A So various mechanisms. It opens a Telnet  
4 connection and executes a set of standard show  
5 commands to identify what those device types are.

6 Q When you say that it executes commands,  
7 it's executing CLI commands?

8 A Correct.

9 Q And then it reads the response from the  
10 network element after it executes a show command?

11 A Correct.

12 Q When you say that they are standard show  
13 commands, what do you mean?

14 A So most -- in the configuration of a  
15 network element, there are some commands that one  
16 could execute to understand what the device type is  
17 and the OS version that is running on it. Those are  
18 very generic. They're CLI or mechanisms like SNMP.  
19 Those are very generic commands.

20 And then based on that, other  
21 configuration commands may be appropriate.

22 Q How does a product know which show  
23 commands to execute, or are you saying that they're  
24 all the same?

25 A So in -- before a command is executed, the

1 A Yes.

2 Q How does a user of Network Automation  
3 indicate which mode it should be executed in?

4 A By enabling the password. To make -- if  
5 there's a script to read the configuration, then it  
6 would -- a non-privileged access is sufficient.

7 If the script is going to change something  
8 in the configuration, then the privileged mode needs  
9 to have -- the product needs to be in the privileged  
10 mode by presenting appropriate credentials.

11 So it depends on the operation.

12 Q Do all third-party switches have  
13 privileged modes?

14 A Most do.

15 Q Do you know if Arista's switches have a  
16 privileged mode?

17 A I believe they do.

18 Q Cisco's?

19 A Yes.

20 Q Juniper's?

21 A I believe they do.

22 Q If you could turn to Appendix C, which  
23 begins with the Bates number ending in 947. All the  
24 way in the back.

25 A Okay.

1 vendor's products or could it be used across  
2 vendors?

3 A Depending on the command, it could be  
4 across vendors.

5 Q And so those -- if a device family is used  
6 across vendors, that's because they also have  
7 similar CLI command syntax?

8 A That is correct.

9 Q Do you know whether HP's Network  
10 Automation customers use device families across more  
11 than one vendor?

12 A I don't know how our customers use that.  
13 The capability is there so that if the CLI is common  
14 or consistent across different vendors, then that  
15 script can be used.

16 Q Are you aware of common CLI that vendors  
17 share with each other?

18 A I don't know how vendors share anything  
19 with each other.

20 Q I'm sorry. Let me rephrase the question.  
21 Are you aware of different vendors having  
22 common CLI?

23 A Yes, there are common elements to CLI from  
24 different vendors.

25 Q Including particular commands and syntax?

1 A Including commands and syntax.

2 Q Are you aware of any particular ones?

3 A Example might be show configuration. It  
4 could be show config, show configuration. Similar,  
5 consistent user that reads that command knows how to  
6 parse it.

7 Q Could you flip to page 120, which has a  
8 Bates number of HPE84218?

9 A Okay. I'm there.

10 Q This page discusses device drivers, which  
11 we've discussed briefly before.

12 A Um-hum.

13 Q And in that first paragraph, it says, "The  
14 Drivers page displays a list of the installed  
15 drivers on your system and the number of drivers  
16 currently in use. The Drivers page enables you to  
17 determine which" -- Network Automation or -- "NA  
18 drivers were built in-house or endorsed by HP, and  
19 as a result are supported by HP."

20 Does HP develop device drivers in-house?

21 A Yes.

22 Q And has it been doing that since the time  
23 that Cisco licensed the product?

24 A Yes.

25 Q Does it also endorse device drivers

1 point says, "Industry-standard CLI with a  
2 hierarchical structure" as the -- as one of the  
3 features of this switch, and underneath it says,  
4 "Reduces training time and expenses, and increases  
5 productivity in multi-vendor installations."

6 A Right.

7 Q Do you have an understanding of what the  
8 industry standard CLI with a hierarchical structure  
9 is?

10 A Yes.

11 Q What is that?

12 A So as we discussed earlier, the reason to  
13 have common, consistent-looking CLI across different  
14 vendors and different device types for the devices  
15 to present a common interface is because users can  
16 leverage the learning on one device to another  
17 device, another class of device.

18 So in the interest of helping our  
19 customers, Hewlett-Packard also implements CLI that  
20 is accepted industry standard so that we minimize  
21 the amount of time customers have to spend learning  
22 our -- our CLI.

23 Q Is the industry standard CLI that HP  
24 implements to help its customers with training time  
25 and expenses, is that a set of specific commands?



1  
2  
3  
4  
5  
6  
7  
8 I, BALAJI VENKATRAMAN, do hereby declare  
9 under penalty of perjury that I have read the  
10 foregoing transcript; that I have made any  
11 corrections as appear noted, in ink, initialed by  
12 me, or attached hereto; that my testimony as  
13 contained herein, as corrected, is true and correct.

14 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
15 2016, at \_\_\_\_\_, \_\_\_\_\_.  
16 (City) (State)

17  
18  
19 \_\_\_\_\_  
20 BALAJI VENKATRAMAN  
21  
22  
23  
24  
25

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were administered an oath; that  
8 a record of the proceedings was made by me using  
9 machine shorthand which was thereafter transcribed  
10 under my direction; that the foregoing transcript is  
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [X] was [ ] was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21  
22 Dated: 05/13/2016

23   
24

25 CARLA SOARES

CSR No. 5908